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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

UNITHERM FOOD SYSTEMS, INC.,)

an Illinois corporation, and)

JENNIE-O-FOODS, INC., a)

Minnesota corporation,)

Plaintiffs,)

vs.) No. CIV 01-347-C

SWIFT-ECKRICH, INC., d/b/a)

CONAGRA REFRIGERATED FOODS,)

a Delaware corporation,)

Defendant.)

THIS DEPOSITION CONTAINS CONFIDENTIAL
ATTORNEYS' EYES ONLY MATERIAL

The continued deposition of CHRISTOPHER
SALM, called for examination, taken before GAIL
LIVIGNI, a Notary Public within and for the County
of Will, State of Illinois, and a Certified
Shorthand Reporter of said state, at Suite 200, 184
Schuman Boulevard, Naperville, Illinois, taken on
the 13th day of February, A.D., 2002, at 9:00
o'clock a.m.

CCPY

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EXHIBIT P

PTO-003322

1 A. The Unitherm equipment, and I believe
2 Heat & Control.

3 Q. Now, you've listed four different ovens.
4 So with the Unitherm equipment, you were able to
5 achieve these Golden Brown color with their
6 product?

7 A. Initially.

8 Q. What do you mean by initially?

9 A. Some of the product that was produced,
10 as we went through our equipment testing, faded
11 over time, and some of it developed a green ring
12 under the surface.

13 Q. And were you involved in the testing of
14 that Unitherm equipment?

15 A. Yes.

16 Q. Explain to me your personal involvement,
17 and then we'll talk about it from a Conagra
18 standpoint. Give me a chronology so that we'll
19 save time as to when the equipment was brought in
20 and your involvement from the beginning to when the
21 equipment was shipped back out six months later.

22 A. Okay.

23 Q. I mean you did have the equipment six
24 months, correct?